



REDACTED – FOR PUBLIC INSPECTION

February 27, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 05-25
RM-10593
Special Access Data Collection
Freedom Ring Communications, LLC, FRN 0004333647**

Dear Ms. Dortch:

Freedom Ring Communications, LLC DBA/ BayRing Communications hereby files redacted responses to the data collection pursuant to the Data Collection Protective Order in the above proceeding.¹ Confidential and Highly Confidential documents have been submitted in the Special Access Web Portal.

Sincerely,

A handwritten signature in black ink that reads "Darren Winslow".

Darren Winslow
CFO
603-766-1000

¹ Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, DA 14-1424 (rel. Oct. 1, 2014).

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Question II.A.5: Map

Special Access Data Request

Freedom Ring Communications, L.L.C. d/b/a BayRing Communications, 0004333647

Section II.A.5: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

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Question II.A.5: Nodes

Special Access Data Request

Freedom Ring Communications, L.L.C. d/b/a BayRing Communications, 0004333647

Section II.A.5: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

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Question II.A.8: Business Rules for Deployment

Special Access Data Request

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Question II.A.8. Business Rules for Deployment: Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

a. Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

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b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

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c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

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Question II.A.10. Marketing Plans

Special Access Data Request

Freedom Ring Communications, L.L.C. d/b/a BayRing Communications, 0004333647

II.A.10. Marketing Plans: Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

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Question II.A.11: RFP's

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**Section II.A.11: ONLY REQUIRED IF RESPONDENT IS A WINNING BIDDER ON AN
RFP; INFORMATION ON UNSUCCESSFUL BIDS IS VOLUNTARY.**

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Question II.A.19. Term and Volume Commitments

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Question II.A.19: Business Justification for Term and Volume Commitments?

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Question II.D.1: Promotional and Advertising Strategies

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II.D.1: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

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